

## EXHIBIT B

(Jan. 1, 2026, email from Plaintiff to GRSM)

**Paulyna Garcia**

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**From:** Const2Audit <[const2audit@gmail.com](mailto:const2audit@gmail.com)>

**Sent:** Thursday, January 1, 2026 11:25:37 AM

**To:** Robert Larsen <[rlarsen@grsm.com](mailto:rlarsen@grsm.com)>

**Cc:** Wing Yan Wong <[wwong@grsm.com](mailto:wwong@grsm.com)>; Robert Schumacher <[rschumacher@grsm.com](mailto:rschumacher@grsm.com)>; Mark Wlaschin <[mwlaschin@sos.nv.gov](mailto:mwlaschin@sos.nv.gov)>; Rachel Wise <[rwise@grsm.com](mailto:rwise@grsm.com)>

**Subject:** URGENT: Notice of Attorney Misconduct & Formal Election Interference Complaint - Drew Ribar

**Dear Mr. Larsen,**

I am writing to formally notify GRSM of a persistent pattern of bad-faith conduct by Rachel L. Wise. Ms. Wise is currently utilizing firm resources to engage in a campaign of administrative harassment and election interference against my First Amendment activities as a candidate for public office.

**The Conduct** Since December 2025, Ms. Wise has filed a series of repetitive "Privacy Complaints" with YouTube regarding my channels, "Drew Ribar for Nevada Assembly" and "Auditing Reno 911". These complaints target videos documenting a federal civil rights lawsuit involving your client, Build Our Center, Inc. (BOC)—a matter of significant public interest. Specifically:

- **False Claims of Privacy:** Ms. Wise is reporting the use of her own professional headshot and name, both of which are published on your firm's public website to solicit business.
- **Interference with Political Speech:** As a candidate for the Nevada Assembly, my commentary on the judicial process and the conduct of officers of the court is core protected speech.
- **Misuse of YouTube's Legal Tools:** Ms. Wise is using "privacy" as a pretext to achieve censorship that she cannot legally obtain through the courts due to Nevada's Anti-SLAPP laws (**NRS 41.637**) and the newsworthiness immunity provided under **NRS 597.790(2)**.

**Client-Directed Suppression and the "Banned List"** Your firm represents Build Our Center, Inc., a 501(c)(3) that has actively interfered in my political campaign. Attached to this correspondence is a "Banned List" distributed by BOC which features my photograph and name. This entity trespassed me from Reno Pride 2025, effectively barring a political candidate from engaging with the community at a public-facing event.

Ms. Wise's current actions on YouTube appear to be a continuation of this BOC-directed effort to suppress my candidacy and shield their conduct from public scrutiny. Using law firm letterhead and administrative reporting tools to assist a client in silencing a political opponent is a severe escalation of this dispute.

**Notice of Intent** Ms. Wise's attempt to use third-party platform reporting tools to bypass judicial scrutiny is a violation of the spirit of professional conduct. Her actions caused administrative strain on my campaign operations on January 1, 2026, alone.

If this pattern continues, I will have no choice but to:

1. **File a formal grievance with the State Bar of Nevada** for conduct unbecoming an officer of the court.

2. **Pursue all available remedies under Nevada's Anti-SLAPP statutes** for the recovery of attorney's fees and damages resulting from this harassment.

I trust that GRSM does not condone the use of firm time and resources to systematically harass political candidates on behalf of a client's political agenda. I request that you instruct Ms. Wise to cease these meritless administrative filings immediately.

Respectfully,

**Drew Ribar**

Candidate, Nevada Assembly 40 <https://www.ribarfornevada.com/>

Auditing Reno 911

775-223-7899

**CC:**

- **Mark Wlaschin**, Deputy Secretary of State for Elections ([mwlaschin@sos.nv.gov](mailto:mwlaschin@sos.nv.gov))
- **Robert S. Larsen**, GRSM Managing Partner ([rlarsen@grsm.com](mailto:rlarsen@grsm.com))
- **Wing Yan Wong**, GRSM Co-Managing Partner ([wwong@grsm.com](mailto:wwong@grsm.com))
- **Rachel L. Wise**, GRSM Associate ([rwise@grsm.com](mailto:rwise@grsm.com))
- **Robert E. Schumacher**, GRSM Senior Partner ([rschumacher@grsm.com](mailto:rschumacher@grsm.com))